

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (WMW/DTS)

| | | |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | DEFENDANTS' JOINT MOTION |
| |) | FOR EXTENSION OF TIME TO |
| v. |) | FILE PRETRIAL MOTIONS |
| |) | |
| ANTON JOSEPH LAZZARO (1), |) | |
| GISELA CASTRO MEDINA (2), |) | |
| |) | |
| Defendant. |) | |

Defense counsel for both defendants move to extend the date for filing of pretrial motions from **October 14, 2021** to **November 15, 2021**, and for a corresponding continuance of the motions hearing date and trial date. Defense counsel has conferred with Assistant United States Attorney Emily Polachek, who indicated she did not object.

The government's discovery deadline in Defendant Medina's case is September 30, 2021, and the government indicates that the discovery is voluminous. Defense counsel for Defendant Lazzaro is also awaiting discovery. Defense counsel need additional time to review the discovery, communicate with the defendants, and draft motions to be filed. Accordingly, the defense moves for a one-month extension of the date to file pretrial motions by and a corresponding continuance of the motions hearing and trial dates.

This motion is made on all the files and records in the case, including Defendants' Joint Motion to Exclude Time Under the Speedy Trial Act and signed Statements of Facts in Support of Exclusion of Time Under Speedy Trial Act.

Respectfully submitted,

Dated: September 30, 2021

/s/Zachary Newland

Zachary Lee Newland

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Dated: September 30, 2021

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Dated: September 30, 2021

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